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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

SEP - 4 1997

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
And Their Impact Upon The Existing	)	
Television Broadcast Service	)	

To: The Commission

OPPOSITION TO PETITION FOR RECONSIDERATION

The Maryland Public Broadcasting Commission, through its attorneys, hereby opposes the Petition for Reconsideration filed in this proceeding by Great Trails Broadcasting, Inc. ("Great Trails").

1. The Maryland Public Broadcasting Commission operates a network of six public television stations serving the State of Maryland, known collectively as Maryland Public Television (MPT). Those stations include noncommercial educational Stations WWPB, Hagerstown and WFPT, Frederick, Maryland. Station WWPB operates on NTSC Channel *31 and has been allotted DTV Channel 44. WFPT operates on NTSC Channel *62 and has been allotted DTV Channel 28. Those are both in-core allotments which could give the stations permanent DTV homes.

2. Great Trails is licensee of Station WHAG, Hagerstown, Maryland. That station operates on NTSC Channel 25 and has been allotted DTV Channel 55. Great Trails on June 13, 1997 petitioned for partial reconsideration of the Commission's decisions in this proceeding. It noted that Channel 55 may not be within the ultimate "core spectrum" for DTV and expressed concern that it might have to revert eventually to its current Channel

25 or find another channel. It also complained that its DTV service area on Channel 55 might be reduced because of interference during the transition period. In "Further Comments" filed August 22, 1997, Great Trails proposes to better its allotment by switching the DTV allotments for Station WHAG-TV and WWPB-TV. That would give Great Trails DTV Channel 44 and leave the tax-supported public television station with the less desirable Channel 55 and the prospect of paying for two channel changes.

3. MPT knows just how Great Trails feels. Of MPT's six stations, two have been allotted DTV channels which may end up outside of the core. Station WCPB-TV, Salisbury, has been allotted DTV Channel 56 and Station WGPT, Oakland, has been allotted DTV Channel 54. Public broadcasters will be hard-pressed to pay for basic digital conversion, much less for double channel changes. America's Public Television Stations, the organization representing the views of public TV, has filed a Petition for Reconsideration in this proceeding asking that no public television station be required to undergo double conversions. MPT is quite unhappy with the prospect of two such conversions. Great Trails seeks to saddle it arbitrarily with a third.

4. In support of its petition, Great Trails states in its Further Comments that its Channel 55 DTV allotment will be short-spaced to MPT's Station WFPT, NTSC Channel *62. It states that "[t]his short-spacing may result in interference between the two signals" (Further Comments, p. 3). Great Trails contends that this possible interference could be best managed if MPT were the licensee of both DTV Channels 55 and 62 (Further Comments, p. 4). Finally, Great Trails suggests that because the stations in the MPT network have partially overlapping signals any loss of service for one of those stations would not likely be a problem (Further Comments, pp. 4-5). The balance of the Further

Comments consists of a complaint that other stations in the region are faring better than Station WHAG-TV in the digital transition. Here is the entirety of the narrative analysis set forth in the engineering statement attached to Great Trails' Further Comments:

> As demonstrated, DTV Channel 55 has a spacing notation which is to a sister MPT station, WFPT(TV), licensed to Frederick, Maryland. Therefore, if any interference does occur to WFPT(TV), the Maryland Public Television Commission [sic] will have control of DTV station WWPB(TV) on Channel 55 and will have the ability to effect timely corrective action.

5. Great Trails request should be denied. It advances no reason why what it deems to be a superior DTV allotment should be plucked from public television and awarded to it for commercial operation. Great Trails' interference argument is not supported by its engineering statement. Great Trails argues that the alleged short-spacing between DTV Channel 55 and NTSC Channel 62 "may result in interference between the two signals" (Further Comments, p. 3) and that if Station WHAG-TV operates on channel 55 "there is a much higher likelihood that viewers in the interference area will lose one, if not both, programming services" (Further Comments, p. 5). In fact, however, as recognized by Great Trails' engineers, any interference would be from Channel 55 to Channel 62 and not in the other direction. Consequently, there is no threat to Great Trail's DTV broadcasts on Channel 55 from MPT's NTSC transmissions.

6. Attached hereto is the statement of MPT's consulting engineers. It shows through detailed analysis that Great Trails' DTV operations on Channel 55 will not result in any interference to the current signal of Station WFPT on NTSC Channel *62. MPT has proposed a modification of the facilities of Station WFPT, but if that modification is implemented there would be only minor predicted interference within the Station WFPT gain area and that predicted interference is acceptable to MPT.

7. In sum, there is no problem with the allotment of Channel 44 for the DTV operations of Station WWPB-TV and no reason why MPT (which already faces the prospect of funding two double channel changes) rather than Great Trails should be allotted potentially non-core Channel 55.

For these reasons, Great Trails' petition for reconsideration should be denied to the extent that it proposes to disrupt the DTV allotment for Station WWPB.

Respectfully submitted,

MARYLAND PUBLIC BROADCASTING COMMISSION

By: Lawrence M. Miller
Lawrence M. Miller

SCHWARTZ, WOODS & MILLER
1350 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-1717

202/833-1700

Its Attorneys

September 4, 1997

ENGINEERING STATEMENT OF KEITH G. BLANTON OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC.,CONSULTING ENGINEERS, IN CONNECTION WITH THE DIGITAL TELEVISION ASSIGNMENT TO MARYLAND PUBLIC BROADCASTING COMMISSION LICENSEE OF TELEVISION BROADCAST STATION WWPB NTSC CHANNEL 31 AT HAGERSTOWN, MARYLAND

I, Keith G. Blanton, am an associate of Kessler and Gehman Associates, Inc., with offices in Gainesville, Florida. I have been working in the field of radio and television consulting engineering since 1961. I graduated from Duke University in 1951 with a Bachelor of Science degree in Physics.

Maryland Public Broadcasting Commission is the licensee of television broadcast station WWPB operating on NTSC channel 31 at Hagerstown, Maryland. It has been assigned DTV channel 44 in Table 1 (The DTV Table of Allotments) in Appendix B of the 6th Report and Order on which to operate during the transition period proposed in the Report and Order. This firm has been employed by Maryland Public Broadcasting Commission to determine if WHAG-TV operating on its assigned DTV channel 55 would as suggested by the licensee of WHAG-TV cause interference to WFPT, also licensed to Maryland Public Broadcasting Commission, and operating on its licensed NTSC channel 62 at Frederick, Maryland. Studies have been made in accordance with the 6th Report and Order and OET Bulletin 69 which demonstrate that WHAG-TV operating on channel 55 as proposed in the 6th Report and Order would not cause interference within the Grade B contour of WFPT operating with its licensed facilities on NTSC channel 62 in areas which are actually served by WFPT.

To demonstrate this lack of interference Figure 1 shows the Grade B contour of WFPT NTSC channel 62 at Frederick, Maryland operating with its licensed power of 3160 kW DA at 276 M AMSL (138 M AAT) and the Longley Rice F(50,90) 65.8 dBu coverage. The "+" symbols represent areas where the signal level exceeds 65.8 dBu, which indicates that service is provided to those areas as defined in the 6th Report and Order. Conversely the white areas within the Grade B contour show where the signal level is less than 65.8 dBu which indicates that no service is provided to those areas. Figure 2 shows the same Grade B contour of WFPT and the "X" symbols represent areas where the D/U ratio is greater than -34 dB thereby indicating that interference would be predicted in those areas from the operation of WHAG-TV on DTV channel 55 at Hagerstown, Maryland and radiating 64.8 kW ND at 568 M AMSL (375 M AAT) as proposed by the FCC in Table 1 of Appendix B of the 6th Report and Order if there is indeed service to those areas. It can be seen in comparing Figures 1 and 2 that none of the areas within the WFPT

Grade B contour which would receive interference from WHAG-TV are in fact served by WFPT.

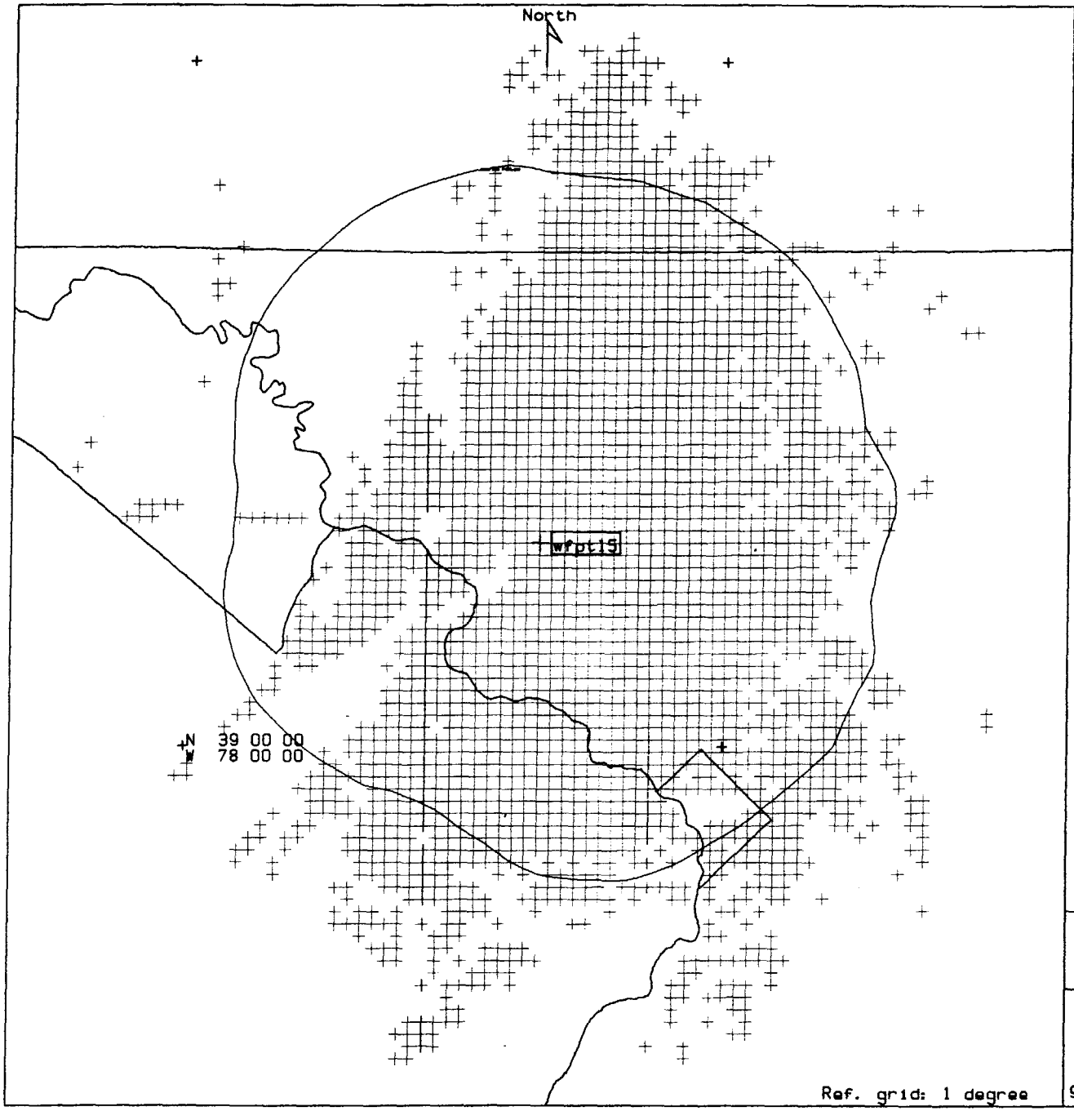
In addition WFPT has an application, File No BPET960624KI, on file to increase the antenna height to 352 M AMSL (213 M AAT) and to continue radiating 3160 kW with a DA antenna at the same licensed site. Therefore similar studies have been made to determine the interference of WHAG-TV to the operation of WFPT in accordance with that proposed in the application. These studies show that only in one or two areas of two square kilometers on the NW periphery of the Grade B contour would interference be predicted to WFPT. I understand that Maryland Public Broadcasting Commission would be willing to accept that minimal interference during the transition period after which WHAG-TV would return to their NTSC channel 25 and WFPT would continue operating on its assigned DTV channel 28. Indeed paragraph 206 of the 6th Report and order indicates that a significant number of NTSC stations will receive new interference as a result of the DTV assignments.

To demonstrate this small area of predicted interference, Figure 3 shows the Grade B contour of WFPT NTSC channel 62 at Frederick, Maryland operating as proposed in the application, File No. BPET960624KI, radiating 3160 kW DA at 352 M AMSL (213 M AAT) and the Longley Rice F(50,90) 65.8 dBu coverage. The "+" symbols represent the areas where the signal level exceeds 65.8 dBu and thereby indicates that service is provided to those areas as defined in the 6th Report and Order. Conversely the white areas within the Grade B contour show where the signal level is less than 65.8 dBu which indicates that no service is provided to those areas. Figure 4 shows the same Grade B contour of WFPT and the "X" symbols represent areas where the D/U ratio is greater than -34 dB thereby indicating that interference would be predicted to those areas from the operation of WHAG-TV on DTV channel 55 at Hagerstown, Maryland and radiating 64.8 kW ND at 568 M AMSL (375 M AAT) as proposed by the FCC in Table 1 of Appendix B of the 6th Report and Order if there is indeed service to those areas.
It can be seen in comparing Figures 3 and 4 that there are only one or two areas of two square kilometers on the NW periphery of the WFPT Grade B contour which would receive interference from WHAG-TV and at the same time be served by WFPT.

KESSLER AND GEHMAN ASSOCIATES, INC.

Keith G. Blanton

September 2, 1997 — Keith G. Blanton, Consultant



MSITE(tm): \MSITE\WWPBDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\msite\pat\ntsc
Height: 10.0 mtrs AGL Gain: .0 dBd

Field strength (at remote)

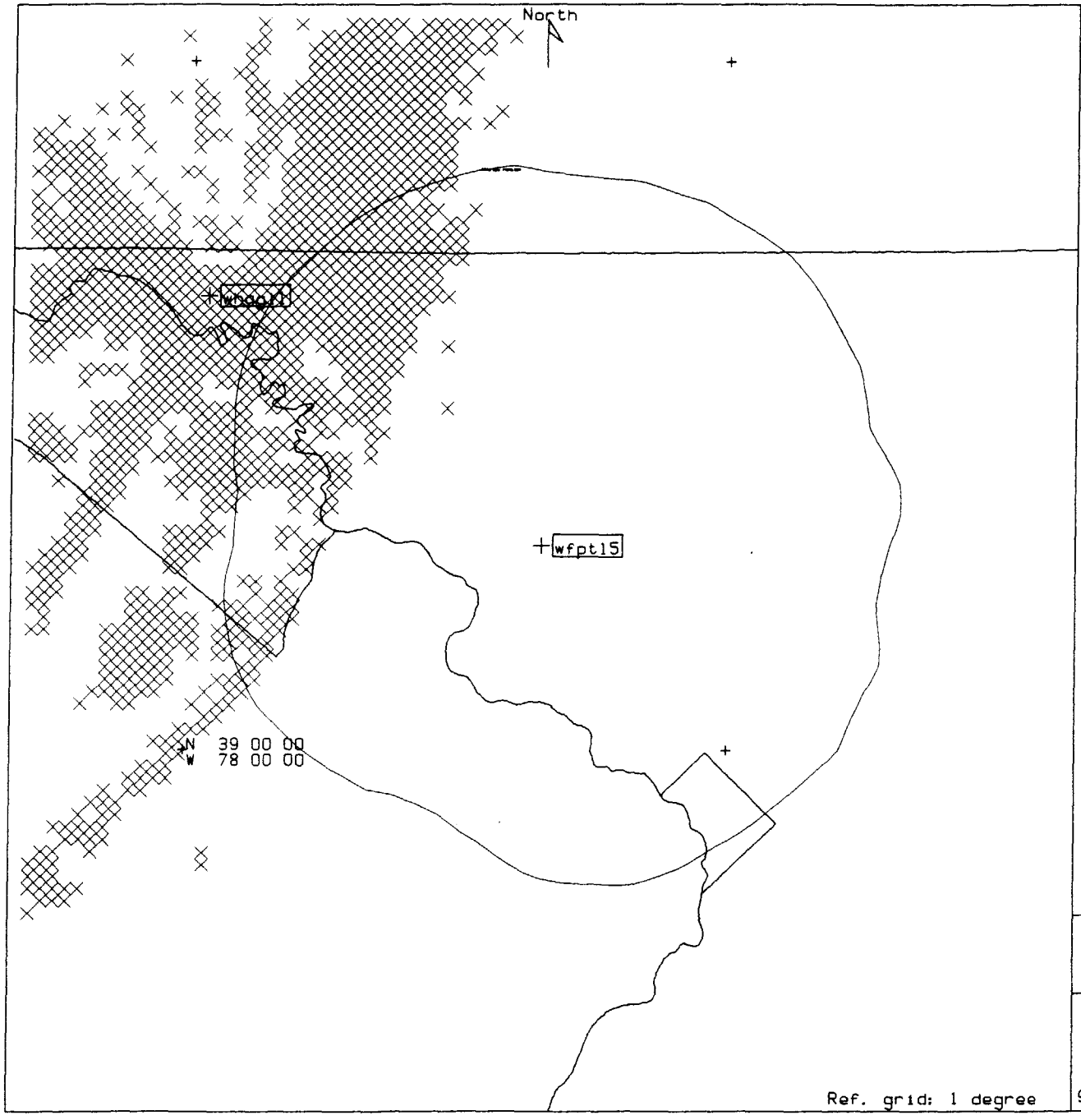
> 65.8 dBuV/m
< 65.8 dBuV/m

Minimum threshold level: -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
wfpt15*	276.0	65.00	DA-H	N 39 17 53.01
grp: 1	761.0000 MHz		.0	W 77 20 35.00

KILOMETERS
20 0 20 40

DTV STUDIES
Kessler and Gehman Associates
970800 FIG. 1



MSITE(tm):\MSITE\WWPBDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\msite\pat\ntsc
Height: 10.0 mtrs AGL Gain: .0 dBd

C/I ratio - group 1 TXs to group 2 TXs

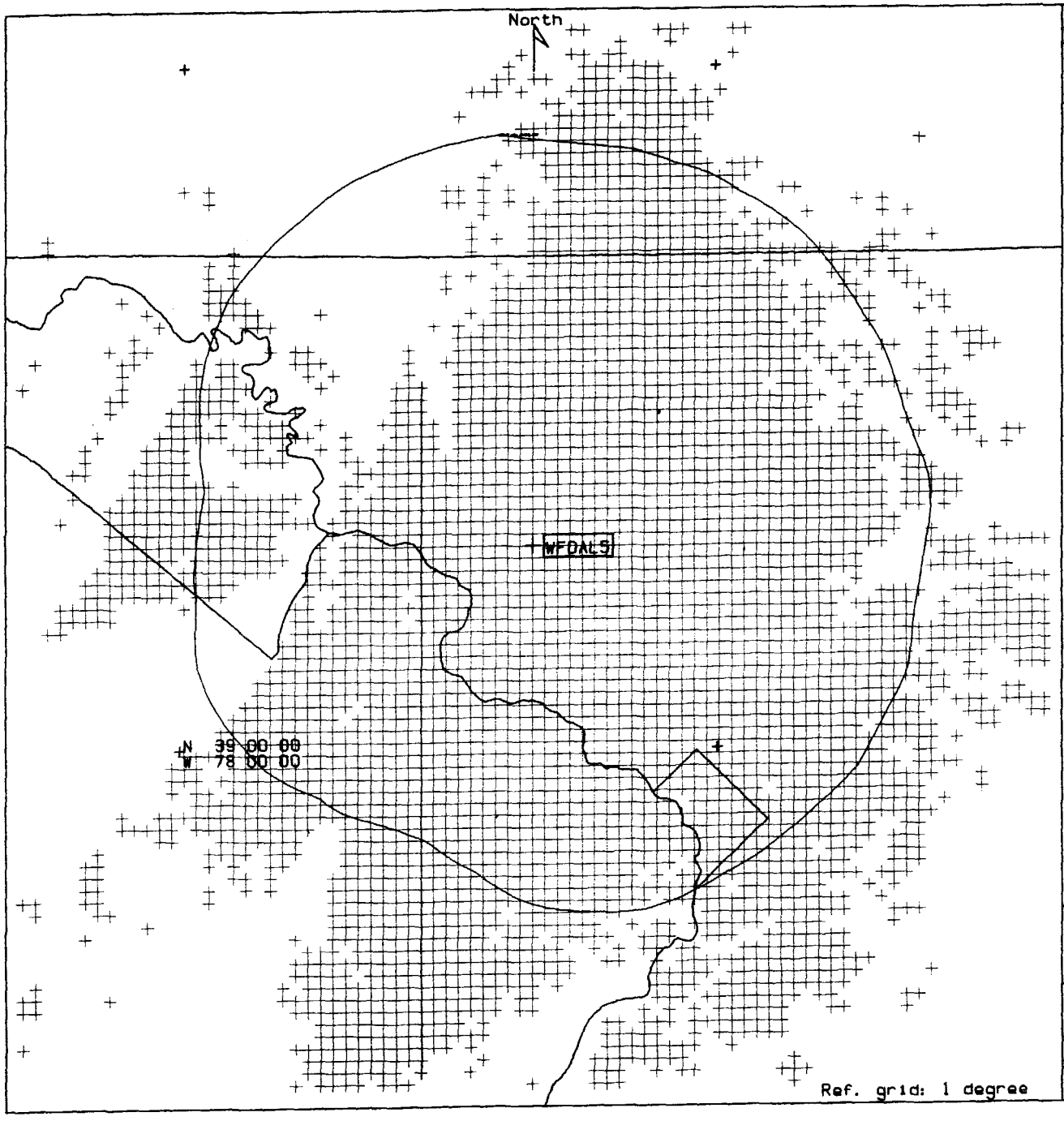
> -34.0
< -34.0

Minimum threshold level: -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
wfpt15*	276.0	65.00	DA-H	N 39 17 53.01
grp: 1	761.0000 MHz		.0	W 77 20 35.00
whag11	568.0	48.12	OM-H	N 39 39 35.00
grp: 2	719.0000 MHz			W 77 57 57.00

KILOMETERS
20 0 20 40

DTV STUDIES
Kessler and Gehman Associates
970800 FIG. 2



MSITE(tm): \MSITE\WWPBDTV.-

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\msite\pat\ntsc
Height: 10.0 mtrs AGL Gain: .0 dBd

Field strength (at remote)

> 65.8 dBuV/m
< 65.8 dBuV/m

Minimum threshold level: -150.0 dBmW

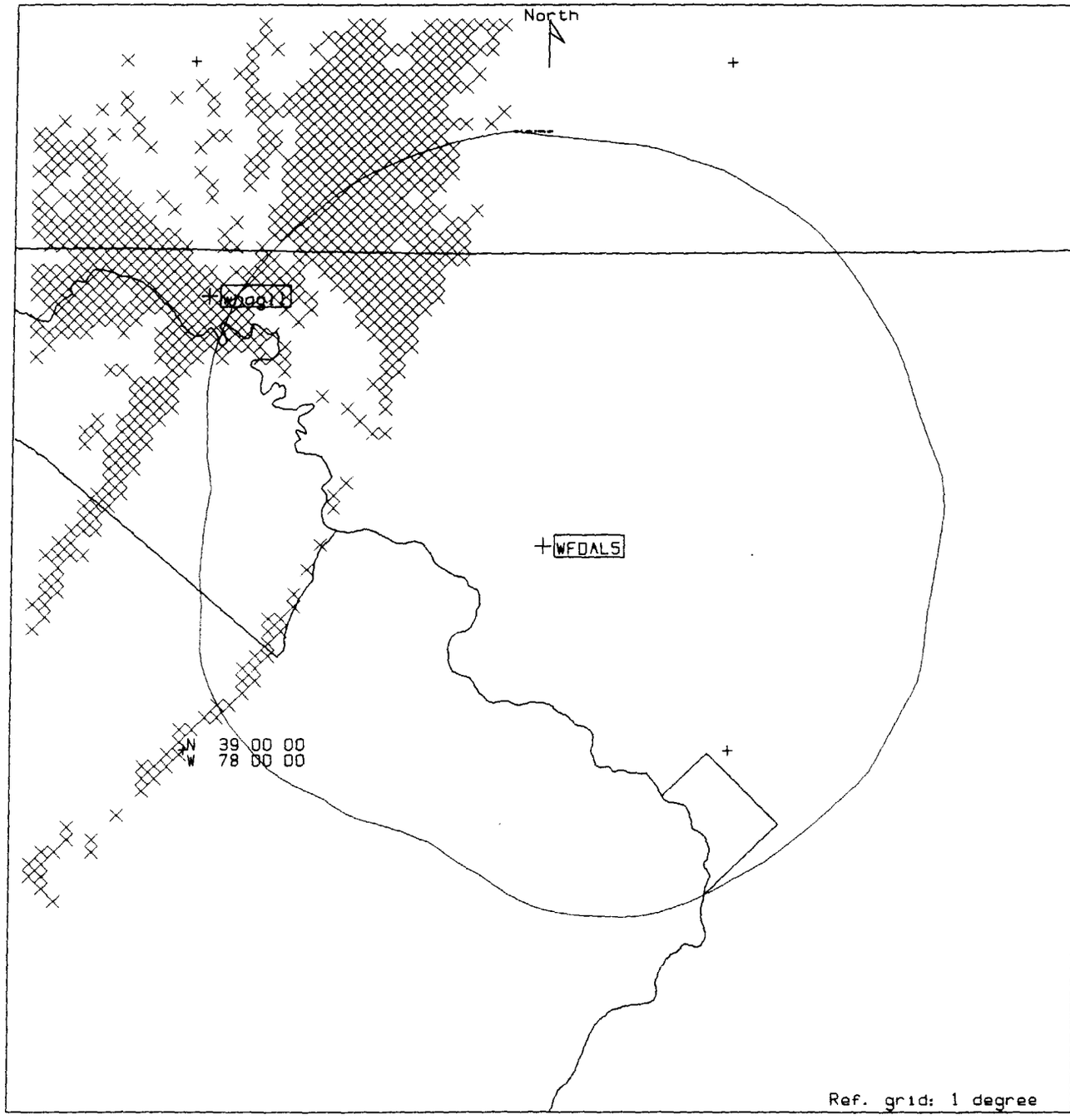
Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WFDAL5*	352.0	65.00	DA-H	N 39 17 53.00
grp: 1	761.0000 MHz		.0	W 77 20 35.00

KILOMETERS
20 0 20 40

DTV STUDIES

Kessler and Gehman Associates

970800 FIG. 3



MSITE(tm):\MSITE\WWPBDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\msite\pat\ntsc
Height: 10.0 mtrs AGL Gain: .0 dBd

C/I ratio - group 1 TXs to group 2 TXs

> -34.0
< -34.0

Minimum threshold level: -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
whagll	568.0	48.12	OM-H	N 39 39 35.00
grp: 2	719.0000 MHz			W 77 57 57.00
WFDAL5*	352.0	65.00	DA-H	N 39 17 53.00
grp: 1	761.0000 MHz		.0	W 77 20 35.00

KILOMETERS
20 0 20 40

DTV STUDIES
Kessler and Gehman Associates
970800 FIG. 4

CERTIFICATE OF SERVICE

I, Nancy M. Cassady, Secretary in the law offices of Schwartz, Woods & Miller, hereby certify that I have on this 4th day of September, 1997, sent by First Class United States mail, postage prepaid, copies of the foregoing OPPOSITION TO PETITION FOR RECONSIDERATION to

James E. Dunstan, Esquire
Haley, Bader & Potts, PLC
4350 North Fairfax Drive
Suite 900
Arlington, VA 22203

Honorable Reed E. Hundt
Chairman, FCC
Room 814
1919 M Street, N.W.
Washington, DC 20554

Honorable James H. Quello
Commissioner, FCC
Room 802
1919 M Street, N.W.
Washington, DC 20554

Honorable Rachelle B. Chong
Commissioner, FCC
Room 844
1919 M Street, N.W.
Washington, DC 20554

Honorable Susan Ness
Commissioner, FCC
Room 832
1919 M Street, NW
Washington, DC 20554

Mr. Victor Tawil
Senior Vice President
Association for Maximum Service Telecasters, Inc.
1776 Massachusetts Avenue, NW
Suite 310
Washington, DC 20036

Jonathan D. Blake, Esq.
Ellen P. Goodman, Esq.
Victoria M. Huber, Esq.
Covington & Burling
1201 Pennsylvania Avenue, NW
P. O. Box 7566
Washington, DC 20044-7566

Nancy M. Cassady